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COCHRAN NEUFELD & SCHECK, LLP

99 Hudson Street
New York, New York 10013

Tel: 212-965-9081

Fax: 212-965-9084

Peter J. Neufeld
Barry C. Scheck
Nick J. Brustin
Debi Cornwall

Johnnie L. Cochran, Jr.
(1937-2005)

Jennifer E. Laurin
Monica R. Shah
Anna Benvenuti Hoffmann

May 9, 2007

By Email and UPS Second Day Mail

Joseph L. Tehan, Jr.
Gregg J. Corbo, Jeffrey T. Blake
Kopelman & Paige, PC
101 Arch Street, 12th Floor
Boston, MA 02110

Re: Waters v. Town of Ayer et al., No. 04 Civ. 10521

Dear Counsel:

Enclosed please find Plaintiff's Second Supplemental Rule 26(a)(1) Disclosure.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,



Micah West
Legal Assistant

Enclosures

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BETTY ANNE WATERS, as
Administratrix of the Estate of
KENNETH WATERS,

Plaintiff,

v.

TOWN OF AYER, NANCY TAYLOR-
HARRIS, in her individual capacity, ARTHUR
BOISSEAU, in his individual capacity,
BUDDY DECOT, in his individual capacity,
WILLIAM ADAMSON, in his individual
capacity, PHILIP L. CONNORS, in his
individual capacity, and JOHN DOE and JANE
DOES 1-16, in their individual capacities,

Defendants.

Case No. 04 10521 (GAO)

PLAINTIFF'S SECOND
SUPPLEMENTAL DISCLOSURE
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 26

Plaintiff, by and through undersigned counsel Cochran Neufeld & Scheck, LLP, and
Robert Feldman, Esq. of Birnbaum & Godkin, pursuant to Federal Rule of Civil Procedure
26(a)(1), provides the following supplement to her initial disclosures:

A. Persons Likely to Have Discoverable Information (with last known addresses)

**Witness/Last Known
Contact Information**

Knowledge of Case

John Baliunas
PO Box 896
Westborough, MA 01581

State Police print examiner, examined latent
prints lifted from the crime scene

Jeannie Nelson (formerly Peacock)
16678 Southeast 80th Bellavista Circle
Lady Lake, Florida 32162-5311

Former employee of Berry Enterprises

Elizabeth O'Connor
28 Erie Street
Providence, RI 02908

Kenneth Waters' mother, damages witness

Pamela Waters
28 Eton Street
Warwick, RI 02886

Kenneth Waters' sister-in-law, damages witness

Christine Waters
28 Haswell Street
Warwick, RI 02889

Kenneth Waters' niece, damages witness

Barbara DeSimone
10 Thompson
Warren, RI 02805

Kenneth Waters' sister, damages witness

Paul Palumbo
San Diego, CA

Kenneth Waters' friend, damages witness

Aidan Graham
11 John Street
Bristol, RI 02809

Kenneth Waters' friend, damages witness

Carolyn Waters
70 Clemente Dr.
East Greenwich, RI 02818

Kenneth Waters' sister, damages witness

David O'Connor
266 Easton Avenue
Warwick, RI 02888

Kenneth Waters' brother, damages witness

Richard Corrente II
29 Oak Street
Middletown, RI 02842

Kenneth Waters' nephew, damages witness

Benjamin Corrente
29 Oak Street
Middletown, RI 02842

Kenneth Waters' nephew, damages witness

Plaintiff reserves the right to further supplement her disclosures as contemplated by the Federal Rules of Federal Procedure and the Court's scheduling order.

BETTY ANNE WATERS,

Dated: May 9, 2007

By: Moni R. Shah

Barry C. Scheck, Esq. (BS 4612)
Deborah L. Cornwall, Esq. (DC 2186)
Monica R. Shah, Esq. (MS 9846)
COCHRAN NEUFELD & SCHECK, LLP
99 Hudson Street, 8th Floor
New York, NY 10013
Tel. (212) 965-9081 / Fax (212) 965-9084

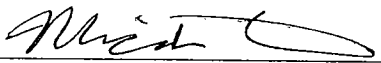
Robert N. Feldman
Birnbaum & Godkin, LLP
280 Summer Street
Boston, MA 02210-1108
Tel. (617) 307-6130 / Fax (617) 307-6101

Attorneys for Plaintiff Betty Anne Waters

PROOF OF SERVICE

I, Micah West, being over eighteen years of age, hereby certify pursuant to the laws of the Commonwealth of Massachusetts that I served the foregoing on the following persons by electronic mail and by placing a copy of it in an authorized receptacle for U.S. mail pickup, this 9th day of May, 2007.

Joseph L. Tehan, Jr.
Gregg J. Corbo
Jeffrey T. Blake
Kopelman & Paige, PC
101 Arch Street, 12th Floor
Boston, MA 02116



Micah West